UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
EMERGENCY RESPONSE BRANCH
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
SE-5J

June 7, 2012

Lisa Williams
United States Department of the Interior
Fish & Wildlife Service
2651 Coolidge Road, Suite 101
East Lansing, Michigan 48823-6316

Dear Lisa:

Thanks to you and the Natural Resource Damage Assessment (NRDA) Trustees for providing comments on the "Restoration Plan for Portage Creek Area Time Critical Removal Action."

With respect to the planting list, we appreciate the suggestions and recommendations on tree and plant selection, grouping, mixing and local nursery sourcing. This information will be passed on to the subcontractor currently developing slope area specific restoration plans for consideration. Regarding the grading to include wetlands, increase flood storage capacity and provide habitat diversity, we will bring this up with the property owners for their consideration in the various slope areas. We will provide draft restoration plans to NRDA Trustees as they are developed for additional input.

The use of geotextile fabric in the stream channel is a design feature presented in the 'Soil Erosion and Sedimentation Control Plan,' which was finalized in September 2011. The plan references and includes the 'State of Michigan Department of Environmental Quality Guidebook of Best Management Practices (BMPs) for Michigan Watersheds' in Appendix C. Specifically, the 'Stream Bank Stabilization,' 'Riprap,' and 'Slope/Shoreline Stabilization' BMPs reference the use of fabric to support, protect and stabilize stream banks. EPA utilized an 8 ounce, non-woven geotextile to support backfill materials in the Ruddiman Creek/Pond project in Muskegon as well as both the Plainwell Impoundment and Plainwell Dam No.2 projects in the Kalamazoo River. The fabric was effective in supporting the weight of heavy aggregates used as backfill, preventing them from sinking into the underlying sediments/peat moss. It also greatly helped in maintaining stable side slopes both during and post-backfill operations and preventing erosion. Nonetheless, in response to your concern, we will continue to monitor and maintain this fabric in the stream channel for the duration of the project, which is scheduled to be completed in 2014.

As you know, EPA's removal program typically does not perform long term monitoring on time critical removal projects. Regardless, as mentioned above, this project is planned for completion in 2014. We plan to perform monitoring and maintenance, if necessary, on preceding slope areas, and will develop performance standards in slope area specific restoration plans. This monitoring and maintenance may include irrigation, limits on fertilizer use, protection from wildlife grazing, and invasive species detection/eradication if necessary. As we are working with the City of Kalamazoo in all phases of this project, it is anticipated that long term monitoring and maintenance responsibilities will be shared for properties owned by the City which will be impacted along the corridor.

Thanks again for your specific comments. They will definitely assist us in moving forward on restoration in the Portage Creek corridor. If you have any questions, please feel free to contact either myself at 312-919-4382 or Craig Thomas at 312-802-9637.

Sincerely,

/ signed PR /

Paul Ruesch
On-Scene Coordinator

cc: Judie Alfano, MDEQ
Todd Goeks, NOAA
Mark Mills, MDNR